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NOAA Fisheries Service

Description of the method and the data used to compute the “Percentage of Total Percentage” for purposes of determining initial allocations of LLP Holder and Captain/Crew Initial Quota Share (QS) in the BSAI Crab QS Fisheries

The Alaska Region of NOAA Fisheries Service (NMFS), Restricted Access Management (RAM) is using a series of computations to calculate how much QS (in units) will be issued to eligible LLP license holders and Captain/Crew QS applicants. In early April 2005, RAM mailed applications to all persons who appeared to be eligible for these types of QS. Included with each application was a Summary of the Official Crab Rationalization Record (Official Record). The Summary included a variety of information derived from the Official Record and concluded with an estimate of the number of units of QS that each eligible applicant would receive. (Note that the same computations will be used for any other applicant who is later determined to be eligible for these types of QS).

The Official Record differs somewhat from data estimates prepared by the North Pacific Fishery Management Council (Council). As a result, some have questioned the methods used by RAM to calculate the estimated QS amounts.

The Official Record differs from the Council’s estimates in two ways:

1. RAM used more updated and accurate data than were available to the Council; and,
2. RAM’s computational method was slightly different from the Council’s (*but both methods yield the same results*).

The amount of QS awarded in a fishery is a function of each eligible person’s “best years participation,” as measured by that person’s percentage of the total harvest in the fishery. After the best years percentages are selected, they are averaged. Because different persons have different “best years,” when all persons’ “Average Percent of Fishery” are summed, the total is greater than 100%. Because we cannot issue more than 100% of the Initial QS Pool, each person’s fraction of the total must be adjusted.

To make this adjustment, the Council suggested applying an “adjustment factor” to each person’s “Average Percent of Fishery”. We, on the other hand, simply divide each person’s “Average Percent of Fishery” by the appropriate sum, which is greater than 100%. Although these two different approaches have caused some confusion, we stress that there is no difference in the outcome. RAM’s “Sums” are essentially the Council’s “Adjustment factors” multiplied by 100.

RAM’s computation method and sums are shown below.

To ensure fairness to all persons receiving an initial award of QS, once we issue QS the sums of everyone’s “Average Percent of Fishery” will be stored for use in subsequent issuance resulting from successful appeals or other agency determinations. However, until that time, these sums of average percentages can change as a result of successful applicant claims.

The initial QS computational steps shown below are excerpted from the Instructions to the QS/PQS Application forms (Instructions). The Captain/crew computations are the same, except that QS is determined by CFEC Interim Use Permit holder (instead of by LLP license):

Steps Taken to Develop Summary of Official Record	Steps (for each LLP license and fishery)	How Displayed on Summary
	1. Sum landings for each vessel(s)	Not Displayed
	2. Divide by LLP holder annual denominator to get percentage for that fishery and season	Not Displayed
	3. Drop seasons with the lowest percentages (if required)	(Remaining Seasons) Displayed as: <i>Season(s) Selected</i>
	4. Calculate average percentage for “best” years (i.e. divide sum of percentages by the number of allowed qualifying seasons)	Displayed as: <i>Average percentage of Fishery</i>
	5. Compute “Percentage of Total Percentages” (i.e., divide average percentage by the sum of all persons’ average percentages)	Displayed as: <i>Percentage of Total Percentages</i>
	6. Sum the percentages of total percentages of all licenses for that person	Displayed as: <i>= X% of LLP Holder Allocation</i>
	7. Multiply the result times 0.97 of the Initial QS Pool for the fishery, as set out in the regulations	Displayed as: <i>Estimated Number of QS Units to be Issued</i>
	8. Calculate CVO and CPO percentages	Displayed as: <i>Percent CVO and Percent CPO</i>

The following table provides data by which an Applicant’s “Average Percentage of Fishery” is divided in the step “Compute “Percentage of Total Percentages”. As discussed above, these sums of average percentages will change with applicant claims but will be fixed when we first issue QS. The following data were used to create Summaries mailed to applicants on April 4, 2005.

Crab QS Fishery	Sum of all person’s “Average Percentage of Fishery” by which an LLP Holder’s “Average Percentage of Fishery” from step #4 is divided in step #5 of Instructions	Sum of all person’s “Average Percentage of Fishery” by which a Captain’s/Crew’s “Average Percentage of Fishery” from step #4 is divided in step #5 of Instructions
BBR	114.58	115.45
BSS	112.22	112.21
BST	130.66	137.34
EAG	100.00	100.00
PIK	121.34	119.50
SMB	117.88	118.91
WAG	100.00	100.00
WAI	121.31	133.33

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